

THE MARKS LAW FIRM, P.C.

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April 23, 2020

**Via ECF**

Honorable Mary Kay Vyskocil  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**RE: Eric Rogers v. Burrito Y Mas, Corp et al.**  
Docket: 1:19-cv-10333-MKV

Dear Judge Vyskocil,

In accordance with your Honor's order, Plaintiff respectfully provides this status report and requests a temporary stay in the above referenced matter. As of today, Defendants have not yet contacted Plaintiff, appeared, answered or otherwise moved. Plaintiff intends to move for default. Due to the ongoing health crisis caused by the COVID-19 pandemic, and the tumultuous economic effects it is causing to virtually all businesses open to the public (including possible complete closures), such as the business involved in this matter, Plaintiff is unable to determine at this time whether the Defendant's business is closed and non-responsive due to a temporary or more permanent closing. Therefore, Plaintiff's undersigned counsel hereby respectfully requests that the Court grant a sixty (60) day stay of all deadlines including the deadlines to move for default. This is the undersigned counsel's first request to stay this matter.

Thank you for your consideration of this unexpected, but essential, request.

Respectfully Submitted,

The Marks Law Firm, P.C.

By: \_\_\_\_\_



Bradly G. Marks